

PATRICK RIAZI, SB# 224017
LAW OFFICE OF PATRICK RIAZI
1007 Seventh Street, Suite 203
Sacramento, California 95814
Telephone: (916) 442-8400
Facsimile: (916) 442-8444

Attorneys for Debtors

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA

In Re:)	Case Number: 2011-49087
)	
MUHAMMAD AHMED JAVED and)	Docket Control No. PR-1
RIFFAT JAVED)	
)	NOTICE OF MOTION BY DEBTOR
)	FOR ORDER OF ABANDONMENT OF
)	DEBTOR'S BUSINESS
)	
)	Date: February 8, 2012
)	Time: 10:00 a.m.
)	Place: Dept. D/Courtroom 34
)	
Debtors)	

COMES NOW, debtor, MUHAMMAD AHMED JAVED, who moves the above-entitled Court for an Abandonment of Debtor's Businesses known as Quick Stop Smog & More and Moon Motors.

- MUHAMMAD AHMED JAVED is the debtor in the above-named Chapter 7 case.
- Debtor is the owner of two businesses known as Quick Stop Smog & More and Moon Motors both located at 3091 Marysville Blvd., Sacramento, California 95815.
- Debtor, in Schedule B has listed the value of the Quick Stop Smog & More business at \$3,000.00, which includes the name and the goodwill of the business. Debtor in Schedule B has

1 listed the value of the equipment at \$4,000, which includes an Emission Tester, Two Post Lifts,
2 Four Post Lift, Lift Jack, Jack Stand, Fluid Flush Machine, Oil Drain Caddy, Computer, Emission
3 Book, Office Desk, Chair and Filing Cabinet; all of which has been claimed exempt in the Debtor's
4 Schedule C.

5 Debtor, in Schedule B has listed the value of the Moon Motors business as \$1.00, which
6 includes the goodwill and the business name. Debtor sells used cars and Debtor has listed all of
7 the vehicles owned by the business in Schedule B. However, none of the vehicles has been claimed
8 exempt in Debtor's Schedule C and the 2002 Nissan Pathfinder has been partially exempted.

9 4. Debtor has 1 full-time employee and is paying a mortgage on the property.

10 5. As of the date of this Motion, the duly appointed Trustee, Alan Fukushima, has not
11 administered such business or the property of such business.

12 6. Debtor asserts that the businesses known as Quick Stop Smog & More and Moon
13 Motors are therefore of inconsequential value to the estate in that there is no equity in such
14 property in excess of the Debtor's exemptions, except for the vehicles not exempt in Schedule B.

15 7. Debtor asserts that the obtaining of an Order of Abandonment is in his best
16 interests as it will allow the debtor to protect the business and the property of the business.

17 WHEREFORE, Debtor request the following relief:

18 1. An Order of Abandonment of Debtor's interest in the businesses known as
19 Quick Stop Smog & More and Moon Motors;

20 2. Such other and further relief as the Court deems just and proper.

21
22
23 Dated: January 12, 2012

/s/

PATRICK RIAZI
Attorney for Debtor